

PATENT
App. Ser. No.: 10/600,317
Atty. Dkt. No. ROC920030231US1
PS Ref. No.: IBM/K30231

IN THE DRAWINGS:

Changes to the specification were made to address the Examiner's objections to the drawings. Furthermore, the attached sheets of drawings include changes to Fig. 3A and Fig. 8A, also to address the Examiner's objections to the drawings.

Attachment: Replacement Sheets for Fig. 3A and Fig. 8A.
Annotated Sheets Showing Changes to Fig. 3A and Fig. 8A.

PATENT
App. Ser. No.: 10/600,317
Atty. Dkt. No. ROC920030231US1
PS Ref. No.: IBM/K30231

REMARKS

This is intended as a full and complete response to the Office Action dated December 16, 2005, having a shortened statutory period for response set to expire on March 16, 2006. Please reconsider the claims pending in the application for reasons discussed below.

In the specification, paragraph [0027] has been deleted. Paragraphs [0048], [0049], [0106], [0114] and [0115] have been amended to correct minor editorial problems.

Claims 1-26 are pending in the application. Claims 7-26 remain pending following entry of this response. Claims 1-6 have been canceled.

Claim Rejections - 35 U.S.C. § 101

Claims 1-6 are rejected under 35 U.S.C. 101 because the claimed invention is directed to non-statutory subject matter. Claims 1-6 are also rejected under 35 U.S.C. 102(a) and 102(e) as being anticipated by *Bays et al.* (US Patent 6,519,603, hereinafter referred as *Bays*). Claims 1-6 have been cancelled, thereby obviating these rejections.

Claim Rejections - 35 U.S.C. § 102

Claims 7-8, 12-21, and 23-26 are rejected under 35 U.S.C. 102(e) as being anticipated by *Barger et al.* (US Pub 2004/0205545, hereinafter referred as *Barger*). Applicants respectfully traverse this rejection.

"A claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference." *Verdegaal Bros. v. Union Oil Co. of California*, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987). "The identical invention must be shown in as complete detail as is contained in the ... claim." *Richardson v. Suzuki Motor Co.*, 868 F.2d 1226, 1236, 9 USPQ2d 1913, 1920 (Fed. Cir. 1989). The elements must be arranged as required by the claim. *In re Bond*, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990).

PATENT
App. Ser. No.: 10/600,317
Atty. Dkt. No. ROC920030231US1
PS Ref. No.: IBM/K30231

In this case, *Barger* does not disclose "each and every element as set forth in the claim." For example, *Barger* does not disclose the limitation present in claims 7 and 20 of "one or more configuration tools allowing a user to define an annotation structure". The Examiner argues that *Barger* discloses "one or more configuration tools allowing a user to define an annotation structure" at Figure 5, paragraphs [0042], [0046], and [0052]. However, the cited figure and passages are in fact directed only to an annotation schema and not to a "configuration tool" as claimed.

As described in paragraph [0042] of *Barger* "Figure 5 is a block diagram illustrating an exemplary schema structure for implementing the common annotation framework." (*Barger* paragraph [0042], Lines 1-3). A "schema" is commonly defined as a diagrammatic presentation, a structured framework or plan, or an outline. (See <http://www.m-w.com/dictionary/schema>). In contrast, claims 7 and 20 refer to "configuration tools allowing a user to define an annotation structure" rather than a framework or an outline as described in *Barger*. Thus, Figure 5 and paragraph [0042] of *Barger* do not disclose the "configuration tools."

Furthermore, paragraphs [0046] and [0052] of *Barger* only describe "fields" and "anchors" which make up components of *Barger*'s "annotation framework" (*Barger* paragraphs [0046] and [0052]). Thus, neither of paragraphs [0046] nor [0052] disclose "configuration tools." Furthermore, nowhere else in *Barger* are "configuration tools allowing a user to define an annotation structure" disclosed or discussed. Therefore, *Barger* fails to disclose each and every element as set forth in the claim. Therefore, applicants submit claim 7 and claim 20 and their dependents are allowable, and allowance of the claims is requested.

Claims 16-19 are rejected under 35 U.S.C. 102(a) and 102(e) as being anticipated by *Bays et al.* (US Patent 6,519,603, hereinafter referred as *Bays*). Applicants respectfully traverse this rejection.

The Examiner argues that *Bays* discloses the claim 16 limitation of "providing at least one graphical user interface screen for defining annotation structures containing

PATENT
App. Ser. No.: 10/600,317
Atty. Dkt. No. ROC920030231US1
PS Ref. No.: IBM/K30231

one or more annotation fields" in Figures 2 and 3B, and in column 7, Lines 15-18 and 43-50. Respectfully, the Examiner errs.

With respect to Figure 2, the figure shows a Graphical User Interface (GUI). The Figure is described in *Bays* as "a schematic or an exemplary computer screen 50 that can be generated using the information management system..." (*Bays*, Col. 7, Lines 15-18). *Bays* goes on to describe the figure more "The screen 50 provides an example of how a user 27 can query data..." (*Bays*, Col. 7, Lines 18-19). Furthermore, "this exemplary query combines attributes of the data along with the annotation content..." (*Bays*, Col. 7, Lines 30-31). Thus the figure only shows a "query", "data", and associated "annotation content." Thus, the GUI in Figure 2 is for viewing data and annotations, not for "defining annotation structures" as is claimed.

The Examiner also cites Lines 43-50 of *Bays* which state:

In operation, one or more users, such as an administrator 27, or the client application 22, start the information management method of the present invention by setting up an annotation structure, as illustrated in FIGS. 3A-3D. The information management system 10 is capable of performing any one or more of the following tasks or processes, with the understanding that it can perform other tasks as well: (*Bays*, Col. 7, Lines 43-50).

Bays continues on to cite a list of tasks, of which none of disclose the claimed limitation. The cited text discusses how an "information management method" may be started. It does not disclose "providing at least one graphical user interface screen for defining annotation structures." Furthermore, although the cited text does disclose "setting up an annotation structure", the cited text does not disclose how an annotation structure is to be set up. More specifically, the cited text does not disclose "setting up an annotation structure" with a graphical user interface. Furthermore, nowhere in the *Bays* patent is a "graphical user interface screen for defining annotation structures" disclosed. Thus, *Bays* fails to disclose each and every element as set forth in the claim. Therefore, claim 16 and its dependents are allowable, and allowance of the claims is requested.

PATENT
App. Ser. No.: 10/600,317
Atty. Dkt. No. ROC920030231US1
PS Ref. No.: IBM/K30231

Therefore, the claims are believed to be allowable and allowance of the claims is respectfully requested.

Claim Rejections - 35 U.S.C. § 103

Claims 9 -11, and 22 are rejected under 35 U.S.C. 103(a) as being obvious over *Bargeron* as applied to claim 7 above, and further in view of *Tada et al.* (US Patent 6,490,583, hereinafter referred as *Tada*).

Claims 9-11 depend on claim 7 which is believed to be allowable, therefore, claims 9-11 are believed to be allowable, and allowance of the claims is respectfully requested. Claim 22 depends on claim 20 which is believed to be allowable, therefore, claim 22 is believed to be allowable, and allowance of the claim is respectfully requested.

Conclusion

The secondary references made of record are noted. However, it is believed that the secondary references are no more pertinent to the Applicants' disclosure than the primary references cited in the office action. Therefore, Applicants believe that a detailed discussion of the secondary references is not necessary for a full and complete response to this office action.

Having addressed all issues set out in the office action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,



Randol W. Read
Registration No. 43,876
PATTERSON & SHERIDAN, L.L.P.
3040 Post Oak Blvd. Suite 1500
Houston, TX 77056
Telephone: (713) 623-4844
Facsimile: (713) 623-4846
Attorney for Applicants

Page 12

439385_1.DOC

Appl. No. 10/600,317
Amdt. Dated Mar. 16, 2006
Reply to Office Action of Dec. 16, 2005
Annotated Sheet Showing Changes

ROC920030231US1

3/28

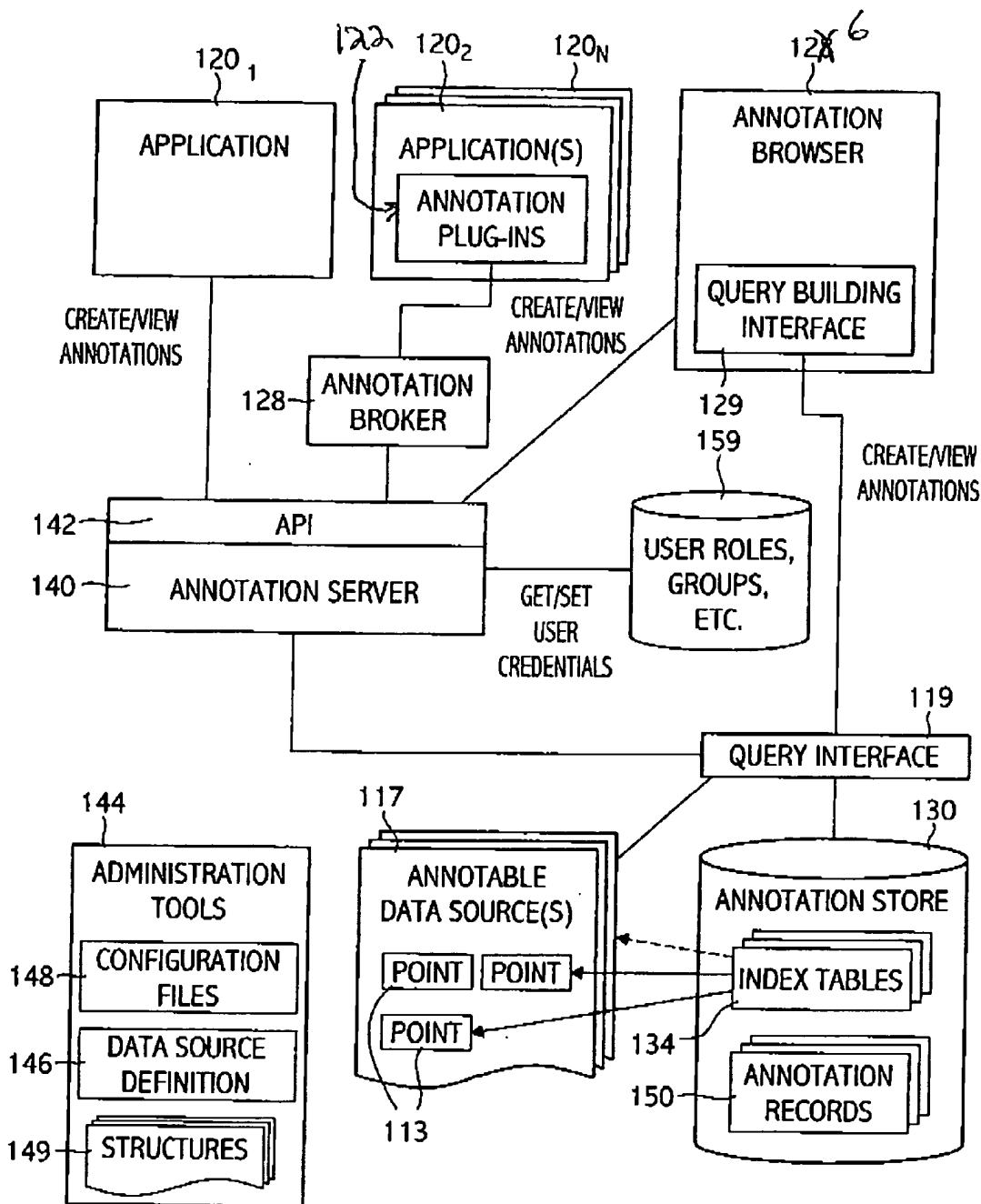


FIG. 3A

Appl. No. 10/800,317
Amdt. Dated Mar. 16, 2006
Reply to Office Action of Dec. 16, 2005
Annotated Sheet Showing Changes

ROC920030231US1

22/28

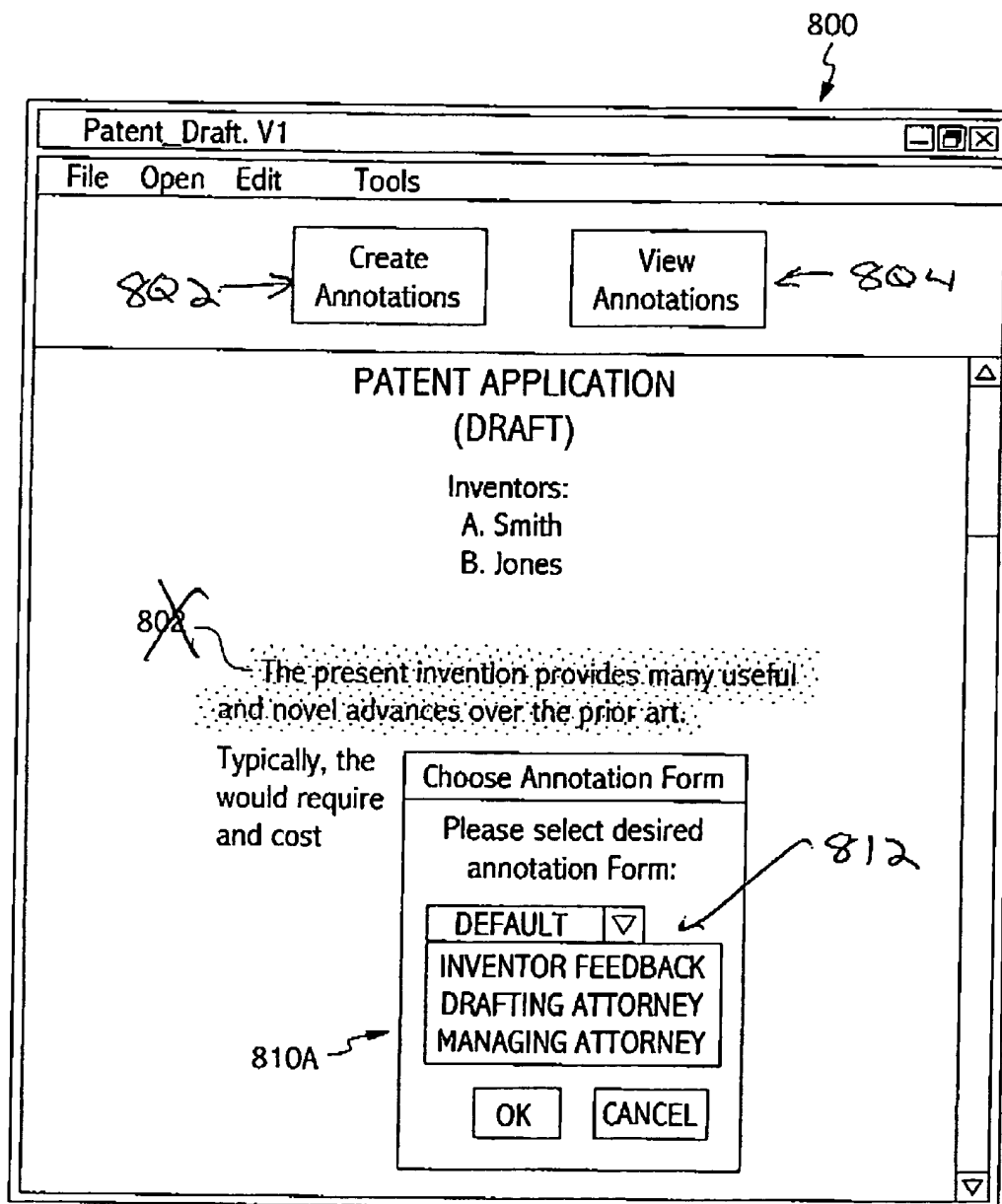


FIG. 8A